

Privacy statements

Content

1	Purpose of this document	2
2	Base information	2
3	Definitions	2
4	Websites	5
4.1	Browsing Cyex.io	5
4.2	Browsing Cyex Rootino Platform	5
5	Business activities	5
5.1	Business-to-Business relationship	5
5.2	Business-to-Customer relationship	6
5.3	Marketing and Public relations	7
6	Cyex Platform	8
6.1	Business-to-Business relationship	8
6.2	Business-to-Customer relationship	9
7	Who may meet with your personal data?	10
7.1	Data processors	10
7.2	Transfers of privacy data	10
8	Security measures	10
9	Your rights and advocacy	11

1 Purpose of this document

Cyex, as a potential international organisation does cross-border processing. This activity means we are working with personal data of our customers or our customers' customers (hereinafter data subjects) throughout its business. Some part of the operation is done as a data controller and the rest as a data processor.

As we are providing our solution in the field of information security and most of us have worked in, data security and data privacy are surpassingly crucial for us. We do our best to comply with the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter GDPR).

The purpose of this document is to give information about our activities in the perspective of personal data privacy regarding processed data, purpose of data processing, lawfulness, rights of data subjects, contacting possibilities and more.

2 Base information

ORGANISATION	Cyex OÜ
MAIN ESTABLISHMENT	Mere pst 8-54, Tallinn, 10111 Estonia
WEB	https://cyex.io/
E-MAIL	hello[@]cyex.io

3 Definitions

Consent	means of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
controller	means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

cross-border processing	means either: (a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or (b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.
international organization	means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.
main establishment	means: (a) as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment; (b) as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation;
personal data	means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
personal data breach	means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

processing	means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
processor	means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
profiling	means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;
pseudonymization	means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
relevant and reasoned objection	means an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;
restriction of processing	means the marking of stored personal data with the aim of limiting their processing in the future;
supervisory authority	means an independent public authority which is established by a Member State pursuant to Article 51;
third party	means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

4 Websites

We apply cookies throughout on our websites. A cookie is a small piece of data sent from our webserver and temporarily stored on your computer by your web browser.

Generally speaking, cookies have been designed to be a reliable mechanism for websites to remember stateful information or to record the user's browsing activity (including clicking particular buttons, logging in, or recording which pages were visited in the past). They can also be used to remember arbitrary pieces of information that the user previously entered into form fields.

4.1 Browsing Cyex.io

The websites are worked in the environment operated by

7Hills IT Kft.

Address: Kandó Kálmán utca 18., H-2013 Pomáz, Hungary

<https://www.7hills.hu/>

4.2 Browsing Cyex Rootino Platform

Browsing our SaaS means you should be registered as either in Business-to-Business relationship or in Business-to-Customer relationship. The websites are worked in the environment operated by

7Hills IT Kft.

Address: Kandó Kálmán utca 18., H-2013 Pomáz, Hungary

<https://www.7hills.hu/>

5 Business activities

5.1 Business-to-Business relationship

The purpose of this kind of data processing activities is to set up and maintain a business-to-business relationship either as parties or as in a partnership.

Purpose	Processed data	Data controller	Data processor	Technology	Legal base	Retention time
Contacting generally	Name, email address, phone number of contacts	Cyex	Google	Email, Internal computers, Social media, Live chat – so it depends	GDPR Article 6 (1) a)	Until withdrawal
Contracting	Name, email address, phone number of contacts	Cyex	Google	Email, Internal computers	GDPR Article 6 (1) b)	Out of a transaction is 3 years
Consultation	Name, email address, phone number of contacts	Cyex	Google	Email, Internal computers	GDPR Article 6 (1) b)	Out of a transaction is 3 years or until restricting data processing or as stated in contract
Billing	Name, email address, phone number of contacts	Cyex	Miller & Company Firm OÜ	Dedicated onsite application	GDPR Article 6 (1) c)	7 years

5.2 Business-to-Customer relationship

The purpose of this kind of data processing activities is to set up and maintain a business-to-customer relationship either as a customer or as in a partnership.

Purpose	Processed data	Data controller	Data processor	Technology	Legal base	Retention time
Contacting generally	Name, email address, phone number of contacts	Cyex	Google	Email, Internal computers, Social media, Live chat – so it depends	GDPR Article 6 (1) a)	Until withdrawal
Billing	Name, email address, phone number of contacts	Cyex	Miller & Company Firm OÜ	Dedicated onsite application	GDPR Article 6 (1) c)	7 years

5.3 Marketing and Public relations

The purpose of this kind of data processing activities is to set up and maintain a business-to-business and a business-to-customer relationship, exactly contacting. The legal base is your consent, and we do not use your availability to contact you by the withdrawal of your consent. However, social media works as a service with its regulations, therefore please inform with studying the relevant privacy statements of our data processors.

Purpose	Processed data	Data controller	Data processor	Technology	Legal base	Retention time
Contacting	account name and publicly shared data	Cyex	Facebook	Social media	GDPR Article 6 (1) a)	Until withdrawal of like
Contacting	account name and publicly shared data	Cyex	LinkedIn	Social media	GDPR Article 6 (1) a)	Until withdrawal of following

Purpose	Processed data	Data controller	Data processor	Technology	Legal base	Retention time
Contacting	account name and publicly shared data	Cyex	Twitter	Social media	GDPR Article 6 (1) a)	Until withdrawal of following

6 Cyex Platform

Our service is a SaaS platform that scales up the cybersecurity knowledge of non-technical employees by learning-by-doing. Each user meets with pragmatic, business-like situations for personal success, competition, achievement and rewards. This operation implies that we profile users with the purpose of analysis of their knowledge and behaviour in security situations to enhance all the necessary components.

To produce the service, we do profiling (as defined in Chapter 3), in which we differentiate Business-to-Business relationship or in Business-to-Customer relationship. Please read forward.

6.1 Business-to-Business relationship

In this relationship, Cyex gives the service for its business-related customer, which desires to measure its users. Definitely, Cyex's customer defines the ultimate purpose of data procession and designates users. This means that Cyex's customer turns up as a data controller, and CCyex itself as a service provider pose to be the data processor in this case.

Cyex's customer has the duty of information to be provided where personal data are collected from the data subject and the existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Considering the purpose of such data procession which can be, e.g., elevating the level of security, in the European Union generally, employers may process employees' data with the legitimate interests pursued by the controller.

Regarding the relationship between Cyex and its customers, it processes data of end-users, who are the real data subjects and who are in direct contract with one of Cyex's customers, in the necessity of the performance of a contract.

Purpose	Processed data	Data controller	Data processor	Technology	Legal base	Retention time
Authentication	User id & password	Cyex's customers	Cyex	Web-based solution	GDPR Article 6 (1) b)	Till the contract alive
Profiling	Nickname, performance through the scenarios	Cyex's customers	Cyex	Web-based solution	GDPR Article 6 (1) b)	Till the contract alive

Cyex applies data processors for its daily operation in connection with its SaaS service. Please inform in Chapter 4.2.

6.2 Business-to-Customer relationship

In this relationship, Cyex gives the service to individuals directly. This means that Cyex turns up as a data controller.

Cyex processes data of individuals as its customers based on their consent. With automated profiling, Cyex gives the possibility for individuals to enhance their capabilities and knowledge in the field of information security, and to share their performance based on their own decision.

Purpose	Processed data	Data controller	Data processor	Technology	Legal base	Retention time
Authentication	User id & password	Cyex		Web-based solution	GDPR Article 6 (1) b)	Till the contract or the registration alive
Profiling	Name, email address, division, performance through the scenarios	Cyex		Web-based solution	GDPR Article 6 (1) a)	Till the contract or the registration alive

Cyex applies data processors for its daily operation in connection with its SaaS service. Please inform in Chapter 4.2.

7 Who may meet with your personal data?

Employees and data processor of Cyex may meet personal data of any data subject in targeted purpose and ways in the necessity of their jobs.

7.1 Data processors

Cyex works with data processors to do its daily operations according to the Section 5. Any other third party is not involved. The location of privacy statements of Cyex's data processors are the following:

Facebook

<https://facebook.com/business/gdpr>

Google Inc.

<https://policies.google.com/privacy>

Miller & Company Firm OÜ

<http://millercolegal.com/>

Twitter

<https://twitter.com/en/privacy>

7Hills

<https://www.7hills.hu/>

7.2 Transfers of privacy data

Cyex does not transfer personal data without the consent of data subjects, except shipping by post offices, or any legal obligation.

8 Security measures

All members of Cyex do their own best to create and manage a secure environment for daily operation and in SaaS service. Many of our members have worked in the clear field of information security or cybersecurity.

In the development, we are on to implement DevSecOps paradigms with security shift left. For the operation, we create, implement and keep up-to-date security measures in risk bases.

9 Your rights and advocacy

You may be initiate to

- request information about your processed personal data,
- make us correct your personal data,
- delete or restrict processing your personal data,
- initiate data portability,
- withdraw your consent,
- object against data processing.

In case of a request, please contact us via the beforementioned email address. After processing your request, but within 3 days, we make our response.

You may contact Estonian supervisory authority:

Nõuandetelefon 5620 2341

([vaata vastamisaegu SIIT](#)),

Üldtelefon 627 4135,

[info\[@\]aki.ee](mailto:info[@]aki.ee)

<https://www.aki.ee/en/inspectorate/staff-and-contacts>